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Attorneys for Defendants
Cohen Dowd Quigley PC,
Ronald J. Cohen, Betsy Lamm,
Daniel Quigley, and Jenna Brownlee

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

FRESH MIX, LLC

Plaintiff,

v.

PISANELLI BICE, PLLC, a Nevada Law Firm
and Professional Limited Liability Company,
JAMES P. PISANELLI, ESQUIRE, an
individual, DEBRA L. SPINELLI, ESQUIRE,
an individual, AVA SCHAEFER, ESQUIRE,
an individual, COHEN DOWD QUIGLEY PC,
an Arizona Law Firm and Professional
Corporation, RONALD J. COHEN, an
individual, BETSY LAMM, an individual,
DANIEL QUIGLEY, an individual, JENNA
BROWNLEE, an individual, BRUCE A.
LESLIE, CHTD, A Nevada Firm, BRUCE A.
LESLIE, an individual; BROWNSTEIN
HYATT FARBER SCHRECK LLP; a
Colorado Limited Liability Partnership;
SAMUEL A. SCHWARTZ, an individual, and
SCHWARTZ LAW, PLLC, and
ZACHARIAH LARSON, an individual , and
LARSON & ZIRZOW, LLC

Defendants.

Case No.: 2:24-cv-00397 JCM-NJK

**STIPULATION AND ORDER
REGARDING COHEN DOWD
QUIGLEY DEFENDANTS’
ACCEPTANCE OF SERVICE OF THE
COMPLAINT AND DEADLINE FOR
DEFENDANTS TO FILE A
RESPONSIVE PLEADING**

[FIRST REQUEST]

Defendants Cohen Dowd Quigley PC, Ronald J. Cohen, Betsy Lamm, Daniel Quigley,
and Jenna Brownlee (the “CDQ Defendants”), and Plaintiff Fresh Mix, LLC (hereinafter the
“Parties”), hereby agree and stipulate as follows:

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1 1. On February 27, 2024, Plaintiff Fresh Mix, LLC filed its Complaint against
2 Defendants. ECF No. 1.

3 2. On March 12, 2024, Plaintiff Fresh Mix, LLC filed an Amended Complaint in this
4 action. ECF No. 8.

5 3. Defendants Cohen Dowd Quigley PC, Betsy Lamm, and Daniel Quigley were
6 served with the Amended Complaint on or about March 26, 2024.

7 4. Counsel for the Defendants, J. Randall Jones, Esq. and Nathanael R. Rulis, Esq.
8 of Kemp Jones, LLP is authorized to and has agreed to accept service of the Amended Complaint
9 on behalf of Defendants Ronald J. Cohen and Jenna Brownlee, on April 5, 2,024.

10 5. The Parties have mutually agreed and stipulate to extend the time period for filing
11 a responsive pleading for the CDQ Defendants. Accordingly, the CDQ Defendants will file a
12 responsive pleading on or before May 3, 2024. This is the first request for an extension of time
13 to respond to the Amended Complaint.

14 6. This extension is requested to provide the CDQ Defendants with sufficient time to
15 review and respond Plaintiff's allegations. This stipulation does not constitute a waiver of any
16 rights or defenses the CDQ Defendants may have in responding to Plaintiff's Amended
17 Complaint.

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7. The Parties stipulation to extend the time to file a responsive pleading is submitted in good faith and is not intended to cause any undue delay or prejudice to any party.

DATED this 5th day of April, 2024.

DATED this 5th day of April, 2024.

FRESH MIX, LLC

THE CDQ DEFENDANTS

By its attorneys,

By their attorneys,

/s/ Matthew Sharp

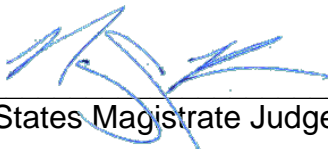
/s/ Nathanael Rulis

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IT IS SO ORDERED:


United States Magistrate Judge

DATED: April 8, 2024

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